

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

INDECK KEYSTONE ENERGY, LLC, a)	
Delaware limited liability company,)	
)	CIVIL ACTION
Plaintiff,)	
)	NO. 04-325E
v.)	
)	
VICTORY ENERGY OPERATIONS,)	JUDGE SEAN J. MCCLAUGHLIN
LLC, a Delaware limited liability)	
company,)	
)	JURY TRIAL DEMANDED
Defendant)	

MOTION FOR ADMISSIONS *PRO HAC VICE*

Defendant, Victory Energy Operations, LLC, by G. Jay Habas, Esquire hereby requests this Court for the Admission *Pro Hac Vice* of Brian Lewis, Esquire and Matthew Garrett, Esquire, and in support thereof avers as follows:

1. Plaintiff, Indeck Keystone Energy, LLC, filed suit in this case asserting claims, *inter alia*, of trademark infringement and misappropriation of trade secrets in connection with certain alleged trade secrets and software related to boiler and related equipment used in the electricity and power generation industries.

2. Brian Lewis, Esquire, and Matthew Garrett, Esquire, both of the law firm of Wildman, Harrold, Allen & Dixon, LLP, of Chicago, Illinois, represent Defendant, Victory Energy Operations, LLC, in connection with this lawsuit. Attorneys Brian Lewis and Matthew Garrett will assist in the representation of Victory Energy Operations during the trial of this cause. Attorney Christopher T. Sheean will continue to serve as primary counsel.

3. Brian Lewis, Esquire, is admitted to the Bar in Illinois and is in good standing with the Supreme Court of Illinois. He is also admitted to the Bars of the United States District

Courts for the Northern, Central and Southern Districts of Illinois, the United States District Courts for the Northern and Central Districts of Indiana, the United States District Court for Arizona, and the United States Court of Appeals for the Seventh Circuit.

4. Matthew Garrett, Esquire, is admitted to the Bar in Illinois and is in good standing with the Supreme Court of Illinois. He is also admitted to the Bars of the United States District Courts for the Northern and Southern Districts of Illinois, the United States Court of Federal Claims, and the United States Court of Appeals for the Seventh Circuit.

5. Attorneys Brian Lewis and Matthew Garrett agree to associate with the undersigned counsel throughout the course of their representation of the Defendant in this matter.

WHEREFORE, Defendant, Victory Energy Operations, LLC, by undersigned counsel, requests the Admission *Pro Hac Vice* of Brian Lewis, Esquire and Matthew Garrett, Esquire, in this case.

Respectfully submitted,

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**

By: *G. Jay Habas/s/*
G. Jay Habas, Esquire
PA I.D. # 55581
Renaissance Centre
1001 State Street, Suite 1400
Erie, Pennsylvania 16501
Telephone: (814) 461-7802
Facsimile: (814) 461-7818
Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

INDECK KEYSTONE ENERGY, LLC, a)	
Delaware limited liability company,)	
)	CIVIL ACTION
Plaintiff,)	
)	NO. 04-325E
v.)	
)	
VICTORY ENERGY OPERATIONS,)	JUDGE SEAN J. MCLAUGHLIN
LLC, a Delaware limited liability)	
company,)	
)	JURY TRIAL DEMANDED
Defendant)	

CERTIFICATE OF SERVICE

I, G. Jay Habas, Esquire, hereby certify on the 16th day of April, 2007, I mailed by U. S. Mail, first class, to the parties listed below, a copy of the Defendant's Motion for Admission, to the following counsel of record:

John K. Gisleson, Esquire
Schnader Harrison Segal & Lewis
120 Fifth Avenue Place
120 Fifth Avenue, Suite 2700
Pittsburgh, PA 15222-3001

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**

By: *G. Jay Habas/s/*
G. Jay Habas, Esquire